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*Counsel for Plaintiff,
Ariel Abittan*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

ARIEL ABITTAN,

PLAINTIFF,

v.

LILY CHAO (A/K/A TIFFANY CHEN, A/K/A
YUTING CHEN), DAMIEN DING (A/K/A
DAMIEN LEUNG, A/K/A TAO DING),
TEMUJIN LABS INC. (A DELAWARE
CORPORATION), AND TEMUJIN LABS
INC. (A CAYMAN CORPORATION),

DEFENDANTS,

and

EIAN LABS INC.,

NOMINAL DEFENDANT.

Case No. 5:20-CV-09340-NC

**DECLARATION OF
CONSTANTINE P. ECONOMIDES IN
SUPPORT OF MOTION TO STAY**

1 I, Constantine P. Economides, declare as follows:

2 1. I am an attorney licensed to practice law in the States of New York and Florida and
3 admitted to practice before this Court *pro hac vice*. I am counsel with the firm Roche Freedman
4 LLP, and counsel for Plaintiff Ariel Abittan (“Plaintiff”). I make this declaration based upon my
5 knowledge of the facts stated herein, and if called to testify, I could and would testify competently
6 thereto. I submit this declaration in support of the parties’ Joint Motion to Stay.

7 2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff’s cross-complaint
8 filed on November 3, 2021 in *Temujin Labs Inc. v. Ariel Abittan et al.*, No. 20-cv-372622, Santa
9 Clara Superior Court (the “state action”).

10 3. Attached hereto as Exhibit B is a true and correct copy of an email from Defendants’
11 counsel related to a demurrer filed by Temujin Labs Inc. (Delaware) in the state action, dated
12 November 24, 2021.

13 4. Attached hereto as Exhibit C is a true and correct copy of “Order Deeming Case
14 Complex and Staying Discovery and Responsive Pleading Deadline,” entered in the state action
15 on November 10, 2020.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed this 12th day of January, 2022 at Miami, Florida.

18 Dated: January 12, 2022

ROCHE FREEDMAN LLP

/s/ Constantine P. Economides

Constantine P. Economides (*pro hac vice*)
Attorney for Plaintiff Ariel Abittan